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Attachment 2

NIAGARA MOHAWK POWER CORPORATION

NIAGARA MOHAWK

300 ERIE BOULEVARD WEST
SYRACUSE, N Y 13202

GERALD K. RHODE
SENIOR VICE PRESIDENT

April 10, 1984
(NMP2L 0029)

Mr. A. Schwencer
Licensing Branch No. 2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regultory Commission
Washington, DC 20555

Dear Mr. Schwencer:

SUBJECT: Nine Mile Point Unit 2
Docket No. 50-410

Attached is the Niagara Mohawk Power Corporation's Nine Mile Point Unit 2 response to Generic Letter 83-28 which concerns the "Required Actions Based on Generic Implications of Salem ATWS Events."

Sincerely,

G. K. Rhode
Senior Vice President

GKR/TRL:lf

8404160070

0 7 7 4 9 0 8 1 1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-410
	)	
(Nine Mile Point Unit 2)	)	

AFFIDAVIT

Gerald K. Rhode, being duly sworn, states that he is a Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 10th day of April, 1984.

Notary Public in and for
Onondaga County, New York

My Commission expires:
HAZEL J. CARRICK
Notary Public in the State of New York
Qualified in Onon. Co No. 4524480
My Commission Expires March 30, 1986

ATTACHMENT A

Required Actions Based on Generic Implications of SALEM ATWS Events

1.1 POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE)

Position

Licensees and applicants shall describe their program for ensuring that unscheduled reactor shutdowns are analyzed and that a determination is made that the plant can be restarted safely. A report describing the program for review and analysis of such unscheduled reactor shutdowns should include, as a minimum:

1. The criteria for determining the acceptability of restart.

2. The responsibilities and authorities of personnel who will perform the review and analysis of these events.

3. The necessary qualifications and training for the responsible personnel.

4. The sources of plant information necessary to conduct the review and analysis. The sources of information should include the measures and equipment that provide the necessary detail and type of information to reconstruct the event accurately and in sufficient detail for proper understanding. (See Action 1.2)

5. The methods and criteria for comparing the event information with known or expected plant behavior (e.g., that safety-related equipment operates as required by the Technical Specifications or other performance specifications related to the safety function).

6. The criteria for determining the need for independent assessment of an event (e.g., a case in which the cause of the event cannot be positively identified, a competent group such as the Plant Operations Review Committee, will be consulted prior to authorizing restart) and guidelines on the preservation of physical evidence (both hardware and software) to support independent analysis of the event.

Response

Administrative controls will be developed at Nine Mile Point Unit 2 which will contain procedures and data collection requirements related to the post-trip review.

The Nine Mile Point Unit 2 response to item 1.1 will be submitted prior to startup.

1.2 POST-TRIP REVIEW - DATA AND INFORMATION CAPABILITY

Position

Licensees and applicants shall have or have planned a capability to record, recall and display data and information to permit diagnosing the causes of unscheduled reactor shutdowns prior to restart and for ascertaining the proper functioning of safety-related equipmnt.

Adequate data and information shall be provided to correctly diagnose the cause of unscheduled reactor shutdowns and the proper functioning of safety-related equipment during these events using systematic safety assessment procedures (Action 1.1). The data and information shall be displayed in a form that permits ease of assimilation and analysis by persons trained in the use of systematic safety assessment procedures.

A report shall be prepared to describe and justify the adequacy of equipment for diagnosing an unscheduled reactor shutdown.

The report shall describe as a minimum:

1. Capability for assessing sequence of events (on-off indications)

    a. Brief description of equipment (e.g., plant computer, dedicated computer, strip chart)

    b. Parameters monitored

    c. Time discrimination between events

    d. Format for displaying data and information

    e. Capability for retention of data and information

    f. Power source(s) (e.g., Class IE, non-Class IE, noninterruptable)

2. Capability for assessing the time history of analog variables needed to determine the cause of unscheduled reactor shutdowns and the functioning of safety-related equipment.

    a. Brief description of equipment (e.g., plant computer, dedicated computer, strip charts)

    b. Parameters monitored, sampling rate and basis for selecting parameters and sampling rate

    c. Duration of time history (minutes before trip and minutes after trip)

    d. Format for displaying data including scale (readability) of time histories

    e. Capability for retention of data, information and physical evidence (both hardware and software)

f. Power source(s) (e.g., Class IE, non-Class IE, noninterruptable)

3. Other data and information provided to assess the cause of unscheduled reactor shutdowns.

4. Schedule for any planned changes to existing data and information capability.

Response

A response to this item will be submitted prior to the startup of Nine Mile Point Unit 2.

2.1 EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE (REACTOR TRIP SYSTEM COMPONENTS)

Position

Licensees and applicants shall confirm that all components whose functioning is required to trip the reactor are identified as safety-related on documents, procedures and information handling systems used in the plant to control safety-related activities, including maintenance, work orders and parts replacement. In addition, licensees and applicants shall establish, implement and maintain a continuing program to ensure that vendor information is complete, current and controlled throughout the life of the plant and appropriately referenced or incorporated in plant instructions and procedures. Vendors of these components should be contacted and an interface established. Where vendors cannot be identified, have gone out of business, or will not supply the information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement and repair to compensate for the lack of vendor backup and to assure reactor trip system reliability. The vendor interface program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgment for receipt of technical mailings. The program shall also define the interface and division of responsibilities among the licensees and the nuclear and nonnuclear divisions of their vendors that provide service on reactor trip system components to assure that requisite control of, and applicable instructions for maintenance work are provided.

Response

The Nine Mile Point Unit 2 response to this item will be provided prior to startup.

2.2 EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE (PROGRAMS FOR ALL SAFETY-RELATED COMPONENTS)

Position

Licensees and applicants shall submit, for staff review, a description of their programs for safety-related* equipment classification and vendor interface as described below:

2.2.1 For equipment classification, licensees and applicants shall describe their program for ensuring that all components of safety-related systems necessary for accomplishing required safety functions are identified as safety-related on documents, procedures and information handling systems used in the plant to control safety-related activities, including maintenance, work orders and replacement parts.

Response

Control of safety-related activities at Niagara Mohawk is accomplished by implementation of a Quality Assurance Program for safety-related sytems, components and structures. Implementation of this program is achieved through administrative controls governing design, procurement, installation, testing, operating and maintenance by responsible Niagara Mohawk organizations. Responsibility for classification of equipment is vested in the Nuclear Engineering and Licensing Department of Niagara Mohawk.

The Equipment Classification List (Q-List) identifies those systems, components and structures to which the Quality Assurance Program applies. Activities associated with these systems, components and structures are required to be accomplished in accordance with the Quality Assurance Program.

2.2.1.1 The criteria for identifying components as safety-related within systems currently classified as safety-related, this shall not be interpreted to require changes in safety classification at the systems level.

Response

General criteria relative to classifying components as safety-related within safety-related systems are contained in FSAR Section 3.2 and Nuclear Regulatory Commission Regulatory Guide 1.26, Rev. 3. In addition, Engineering Procedures will provide a vehicle for various departments within Niagara Mohawk to request a determination as to the safety-related classifications of components and services. When appropriate, the Equipment Classification List (Q-List) will be updated to reflect such determinations.

* Safety-related structures, systems, and components are those that are relied upon to remain functional during and following design basis events to ensure: (1) the integrity of the reactor coolant boundary, (2) the capability to shut down the reactor and maintain it in a safe shutdown condition, and (3) the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the guidelines of 10 CFR Part 100.

2.2.1.2 A description of the information handling system used to identify safety-related components (e.g., computerized equipment list) and the methods used for its development and validation

Response

The current Equipment Classification List (Q-List) is provided in the FSAR. Responsibility for preparation and control of the Equipment Classification List (Q-List), as well as review and approval, will be specified in Engineering Procedures.

2.2.1.3 A description of the process by which station personnel use this information handling system to determine that an activity is safety-related and what procedures for maintenance, surveillance, parts replacement and other activities defined in the introduction to 10 CFR 50, Appendix B, apply to safety-related components.

Response

A response will be provided prior to startup.

2.2.1.4 A description of the management controls utilized to verify that the procedures for preparation, validation and routine utilization of the information handling system have been followed

Response

Safety-related activities will be governed by various administrative controls which implement the Quality Assurance Program. Adherence to the Quality Assurance Program will be monitored primarily through the use of audits and inspections. These audits and inspections will encompass the various safety-related activities and will be performed at various frequencies. For example, maintenance activities on safety-related equipment will be subject to Quality Assurance inspections on a routine basis. Other audits or inspections will be performed less often but cover a longer period of operation or activity. Items of noncompliance identified as a result of these audits and inspections will be documented in accordance with provisions of the Quality Assurance plan and will be carried as open items until resolved.

2.2.1.5 A demonstration that appropriate design verification and qualification testing is specified for procurement of safety-related components. The specifications shall include qualification testing for expected safety service conditions and provide support for the licensees' receipt of testing documentation to support the limits of life recommended by the supplier.

Response

Safety-related engineering specifications will contain qualification testing requirements. Equipment qualification information is discussed in FSAR Section 3.11.

Attributes such as design verification and qualification testing associated with procurement of safety-related components will be addressed in appropriate engineering procedures. Engineering Procedures will identify procedural provisions to ensure that the applicable regulatory requirements, design bases and quality requirements are met when obtaining material and services.

2.2.1.6 Licensees and applicants need only to submit for staff review the equipment classification program for safety-related components. Although not required to be submitted for staff review, your equipment classification program should also include the broader class of structures, systems and components important-to-safety required by GDC-1 (defined in 10 CFR Part 50, Appendix A, "General Design Criteria, Introduction").

Response

With respect to the equipment classification program in use at Niagara Mohawk for structures, systems and components Important to Safety, we are participating in the Utility Safety Classification Group and are seeking a generic resolution to the Staff's concern in this regard through the efforts of the Group. We do not agree that the plant structure and components important to safety constitute a broader class than the safety-related set. Nevertheless, we believe that nonsafety-related plant structures, systems and components have been designed and are maintained in a manner commensurate with their importance.

2.2.2 For vendor interface, licensees and applicants shall establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of their plants, and appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment should be contacted and an interface established. Where vendors cannot be identified, have gone out of business, or will not supply information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC-1). The program shall be closely coupled with action 2.2.1 above (equipment qualification). The program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgment for receipt of technical mailings. It shall also define the interface and division of responsibilities among the licensee and the nuclear and nonnuclear divisions of their vendors that provide service on safety-related equipment to assure that requisite control of and applicable instructions for maintenance work on safety-related equipment are provided.

Response

Niagara Mohawk is actively participating in a Nuclear Utility Task Action Committee (NUTAC) on Generic Letter 83-28, item 2.2.2. It is expected that this Committee will present its recommendations to the participating utilities in mid-1984. Niagara Mohawk will then review these recommendations and will submit the Nine Mile Point Unit 2 response prior to startup.

3.1 POST-MAINTENANCE TESTING (REACTOR TRIP SYSTEM COMPONENTS)

Position

The following actions are applicable to post-maintenance testing:

1. Licensees and applicants shall submit the results of their review of test and maintenance procedures and Technical Specifications to assure that post-maintenance operability testing of safety-related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.

2. Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the technical specifications, where required.

3. Licensees and applicants shall identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which are perceived to degrade rather than enhance safety. Appropriate changes to these test requirements, with supporting justification, shall be submitted for staff approval.

Response

The Nine Mile Point Unit 2 response to this item will be provided prior to startup.

3.2 POST-MAINTENANCE TESTING (ALL OTHER SAFETY-RELATED COMPONENTS)

Position

The following actions are applicable to post-maintenance testing:

1. Licensees and applicants shall submit a report documenting the extending of test and maintenance procedures and Technical Specifications review to assure that post-maintenance operability testing of all safety-related equipment is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety functions before being returned to service.

2. Licensees and applicants shall submit the results of their check of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications where required.

3. Licensees and applicants shall identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which are perceived to degrade rather than enhance safety. Appropriate changes to these test requirements, with supporting justification, shall be submitted for staff approval.

Response

The Nine Mile Point Unit 2 response to this item will be provided prior to startup.

4.1 REACTOR TRIP SYSTEM RELIABILITY (VENDOR-RELATED MODIFICATIONS)

Response

Not applicable to Nine Mile Point Unit 2.

4.2 REACTOR TRIP SYSTEM RELIABILITY (PREVENTATIVE MAINTENANCE AND SURVEILLANCE PROGRAM FOR REACTOR TRIP BREAKERS)

Response

Not applicable to Nine Mile Point Unit 2.

4.3 REACTOR TRIP SYSTEM RELIABILITY (AUTOMATIC ACTUATION OF SHUNT TRIP ATTACHMENT FOR WESTINGHOUSE AND B&W PLANTS)

Response

No applicable to Nine Mile Point Unit 2.

4.4 REACTOR TRIP SYSTEM RELIABILITY (IMPROVEMENTS IN MAINTENANCE AND TEST PROCEDURES FOR B&W PLANTS)

Response

Not applicable to Nine Mile Point Unit 2.

4.5 REACTOR TRIP SYSTEM RELIABILITY (SYSTEM FUNCTIONAL TESTING)

Position

On-line functional testing of the reactor trip system, including independent testing of the diverse trip features, shall be performed on all plants.

4.5.1 The diverse trip features to be tested include the breaker undervoltage and shunt trip features on Westinghouse, B&W (See Action 4.3 above) and CE plants; the circuitry used for power interruption with the silicon controlled rectifiers on B&W plants (see Action 4.4 above); and the scram pilot valve and backup scram valves (including all initiating circuitry) on GE plants.

Response

Niagara Mohawk is participating in a Boiling Water Reactor Owners Group to address this item. Considering the similarity of the reactor trip system of virtually all boiling water reactors, an Owners Group is the most effective means of developing an appropriate response to this item.

General Electric will evaluate the adequacy of the current specifications for functional testing of the reactor trip systems and will address functional testing of the scram pilot valves and backup scram valves. It is anticipated that the results of this evaluation will be available to incorporate the results in our procedures.

A response will be provided prior to startup.

4.5.2 Plants not currently designed to permit periodic on-line testing shall justify not making modifications to permit such testing. Alternatives to on-line testing proposed by licensees will be considered where special circumstances exist and where the objective of high reliability can be met in another way.

Response

A response will be provided prior to startup.

In addition, Nine Mile Point Unit 2 will record the scram times of certain control rods upon every reactor scram.

This scram time testing will demonstrate the action of the pilot scram valves and scram inlet and discharge valves.

4.5.3 Existing intervals for on-line functional testing required by Technical Specifications shall be reviewed to determine that the intervals are consistent with achieving high reactor trip system availability when accounting for considerations such as:

1. uncertainties in component failure rates
2. uncertainties in common mode failure rates
3. reduced redundancy during testing
4. operator errors during testing
5. component "wear-out" caused by the testing

Response

Niagara Mohawk is participating in another committee of the Boiling Water Reactor Owners Group formed to address potential Technical Specification improvements. This Committee is expected to finalize their program in late 1984 so that the results of the program can be incorporated in the Unit 2 Technical Specifications prior to operation.

A response will be provided prior to startup.

04-448-91

Generic 2083-28

INTERNAL CORRESPONDENCE
FORM 112-2 R 02-80 55-01-013

FILE COPY

NIAGARA MOHAWK

FROM T. R. Loomis

TO D. LoSurdo

DISTRICT Syracuse

DATE May 15, 1986

FILE CODE

SUBJECT Verification of Commitments in Our April 15, 1986 Response to Generic Letter 83-28

Attachment 1 is a May 13, 1986 memo from S. Nicolaos to R. Randall concerning the commitment made in Section 2.2.2 of our April 15, 1986 response to Generic Letter 83-28 (Attachment 2). In this memo, Mr. Nicolaos has identified the establishment of a vendor interface program which was recommended by the NRC reviewer in an NRC meeting in Washington, D.C. on March 31, 1986 (Attachment 3). Licensing requests that NC&V review the May 13, 1986 memo to ensure that it satisfies the commitment identified in your May 2, 1986 verification memo concerning Section 2.2.2 (Attachment 4).

T. Loomis

T. R. Loomis
Licensing Engineer

TRL:ja
1614G
Attachments

xc: S. Nicolaos
R. Randall
M. Brause
A. F. Zallnick, Jr.

INTERNAL CORRESPONDENCE
FORM 112-2 R 02-80 55-01-013

Attachment 1

NIAGARA MOHAWK

FROM S.C. Nicolaos SC Nicolaos

TO R.G. Randall

DISTRICT NMP2

DATE 5/13/86

FILE CODE NMP-18408

SUBJECT Generic Letter 83-28
"Vendor Interface Program"

References

Letter from S.C. Nicolaos (NMPC) to A.J. Acton (Borg-Warner, Byron-Jackson Pump Division) 5/10/86, NMP-18405.
Letter from S.C. Nicolaos (NMPC) to G.L. Miller (Cooper-Bessemer, Energy Services Group) 5/10/86, NMP-18404.
Letter from S.C. Nicolaos (NMPC) to R. Lauretig (Electro-Motive Division) 5/12/86, NMP-16971.
Letter from T.E. Lempges (NMPC) to E.G. Adensam (NRC), 4/15/86, Response to Generic Letter 83-28, NMP2L-0687.

In reference to the commitment made in Section 2.2.2 regarding the development of a vendor interface program with two major vendors, other than the NSSS supplier, Technical Support has initiated this program per telephone conversation (attachments) with three major vendors of safety-related equipment. The Emergency Diesel Generator Vendors, Cooper-Bessemer and General Motors, (EMD); and Borg-Warner, Byron Jackson's Pump Division. Both Cooper-Bessemer and Borg-Warner have agreed to send their technical bulletins to the Technical Support Supervisor with an acknowledgement sheet in which Niagara Mohawk is responsible for completing and returning to the vendor. General Motors, Electro-Motive Division (EMD) has also agreed to send their technical information to the Technical Support Supervisor with an annual index, so that current listings can be audited.

The Technical Support Department will establish, assess, and maintain a file of all these technical bulletins sent to Nine Mile Point. Therefore, it is the intention of this program to satisfy the NRC's requirements with regard to vendor interface programs. Nine Mile Point Unit 2 can consider this item closed (IOC Commitment List Item #10, NMP-18401).

SCN:kh

cc: (w/attachments)

G.D. Wilson
~~T.J. Loomis~~
D. LoSurdo

(w/out attachments)

T.E. Lempges
R.B. Abbott
W.C. Drews
J.R. Spadafore
A.F. Zallnick
B. Weakley
M. Meehan

NIAGARA MOHAWK

NINE MILE POINT NUCLEAR STATION / P.O. BOX 32 LYCOMING, NEW YORK 13093 / TELEPHONE (315) 343-2110

May 10, 1986
(NMP-18405)

Mr. Andrew J. Acton
Sr. Sales Engineer
Byron-Jackson Pump Division
P.O. Box 110
Trumbull, Connecticut 06611

Dear Mr. Acton:

This letter will confirm our telephone conversation of 4/30/86 regarding Byron-Jackson's Technical Service Bulletins. Byron-Jackson will provide Niagara Mohawk with copies of all relevant Technical Service Bulletins as these bulletins are published. Niagara Mohawk will establish and maintain a file of all your technical bulletins received by Nine Mile Point and act on any that are applicable. We will also complete and return to Byron-Jackson, the acknowledgement sheet provided with the bulletin stating that we have received the bulletin. This positive feedback from Nine Mile Point will provide you with assurance that all technical information has been received. It is the intention of this program to satisfy the NRC's requirements with regard to vendor interface programs contained in Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events."

If you have any questions, please do not hesitate to call me at (315) 349-2618.

Very truly yours,

Stephen C. Nicolaos

Stephen C. Nicolaos
Generation Engineer
Technical Support

SCN:kh

NIAGARA MOHAWK

NINE MILE POINT NUCLEAR STATION / P.O. BOX 32 LYCOMING, NEW YORK 13093 / TELEPHONE (315) 343-2110

May 10, 1986
(NMP-18404)

Mr. Glenn L. Miller
Service Manager
Cooper-Bessemer Energy Services Group
North Sandusky Street
Mount Vernon, Ohio 43050

Dear Mr. Miller:

This letter will confirm our telephone conversation of 4/2/86 regarding Cooper-Bessemer Service News ("Green Sheets"). Cooper-Bessemer will provide Niagara Mohawk with copies of all relevant Service News Bulletins as these bulletins are published. Niagara Mohawk will establish and maintain a file of all your technical bulletins received by Nine Mile Point and act on any that are applicable. We will also complete and return to you (the Energy Services Group), the acknowledgement sheet provided with the bulletin stating that we have received the bulletin. This positive feedback from Nine Mile Point will provide you with assurance that all technical information has been received. It is the intention of this program to satisfy the NRC's requirements with regard to vendor interface programs contained in Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events."

If you have any questions, please do not hesitate to call me at (315) 349-2618.

Very truly yours,

Stephen C. Nicolaos

Stephen C. Nicolaos
Generation Engineer
Technical Support

SCN:kh

NIAGARA MOHAWK

NMP-16971

NINE MILE POINT NUCLEAR STATION / P.O. BOX 32 LYCOMING, NEW YORK 13093 / TELEPHONE (315) 343-2110

May 12, 1986

Mr. Rick Lauretig
Department - 704
Electro - Motive Division
General Motors Corporation
La Grange, Illinois 60525

Dear Mr. Lauretig:

This letter is to confirm our telephone conversation of 5/7/86 regarding Maintenance Instructions and Power Pointer Bulletins. EMD will provide Niagara Mohawk with copies of all relevant Maintenance Instructions and Power Pointer Bulletins as these bulletins are published. Niagara Mohawk, under the Technical Support Supervisor, will establish and maintain a file of all your technical bulletins recieved by Nine Mile Point. Niagara Mohawk will also review the maintenance instruction index, which is distributed annually, to assure all current listings have been recieved and are maintained. It is the intention of this program to satisfy the NRC's requirements with regard to vendor interface programs contained in Generic Letter 83-28, "Required Actions Based on Generic Implication of Salem ATWS Events." Thank you for your cooperation and support.

If you have any questions, please do not hesitate to call me at (315) 349-2618.

Very truly yours,

Stephen C. Nicolaos

Stephen C. Nicolaos
Generation Engineer
Technical Support

SCN/meh

2.2 (Cont'd)

Attachment 2

Response:

The Operations Assessment Program (AP-3.4.2, TDP-5) contain these attributes.

Guideline:

(4) Administrative procedures should require that plant procedures at least reference appropriate Equipment Technical Information (ETI).

(5) Appropriate Equipment Technical Information (ETI) should be incorporated into the performance and quality review sections of safety-related procedures.

Response:

S-MI-GEN-002, Maintenance Instructions for Writing Procedures, and S-IDP-PO, Outline for I&C Department Procedures contain provisions that require the use of Equipment Technical Information (ETI) in writing maintenance procedures.

Guideline:

(6) Vendors or outside contractors who perform or provide safety-related services shall be subject to adequate utility control and shall conform to utility or utility-approved QA procedures and controls.

Response:

All work performed on safety-related equipment at Nine Mile Point Unit 2 must be performed with NMPC approved procedures, regardless of whether it is performed by NMPC employees or outside vendors or contractors. Consequently all work is performed in conformance with NMPC or NMPC approved QA procedures and controls.

Guideline:

Licensee response should show that interfaces have been or are being established with at least two or more major vendors of safety-related equipment other than the NSSS. Examples of such vendors include: diesel generator vendor, switchgear vendor, major pumps vendor, or vendor of motor-operated valves.

2.2.2 (Cont'd)

Response:

NMPC strongly endorses the NUTAC report on Generic Letter 83-28. NMPC will attempt to establish a vendor interface program with two major vendors of safety-related equipment other than the NSSS. It is our intention to develop this relationship with the diesel generator vendor, and/or with the major vendor of motor operators for valves, and/or with the major vendor of valves, and/or with the vendor of safety-related switchgear. This relationship will be developed expeditiously, however due to uncertainties in the willingness of these companies to participate, no commitment date can be specified at this time. It should be noted, however, that the existing SIL program covers the components in the GE scope of supply, which includes components in the following major systems: ECCS, including RCIC; ADS; SLC; RWCU; RPS; Recirculation; Neutron monitoring, including RSCS; RRCS; and Fuel Handling among others. Therefore the intent of this guideline is met without establishing two additional vendor interface programs.

Guideline:

Licensee response should show that they have committed to work with INPO to ensure accomplishment of INPO Implementation Responsibilities as described in Sections 3.2, 4.1.2, and 4.2.2.1 of the NUTAC/VETIP report.

Response:

INPO has prepared revisions to NPRDS and SEE-IN as described in the attached letter.

Guideline:

The vendor interface program should include periodic contact with the NSSS vendor to assure that the latest versions of maintenance, test, service, and modification recommendations are in the licensee's possession.

Response:

TDP-5 has been revised to require annual contact with General Electric regarding the SIL program and an audit of the results to assure that all the SILs are in NMPC's possession.